

M/027/007  
Received 12/95(?)

**SURFACE INSPECTION  
COMPLIANCE REPORT**

Date of Inspections: July 18, 1995

Case Serial No.: UTU-063447

Operator: Jumbo Mining Company, Drum Mine

Project Description: Cyanide Heap Leach (Non-operational Status)

Legal Description: T. 15 S., R. 10 W., Section 7 (predominantly)

District and Resource Area: Richfield/HRRA

Inspectors: Rody Cox, Bill Wagner, Ed Bush, Kimmel King, Doug Taylor, Scott Hopkins, Hartshorn and Don Gavin

On March 10, 1995, a notice of noncompliance (NON) was sent to Jumbo Mining Company (Jumbo). The notice cited drums of abandoned or discarded chemical products, which appeared improperly stored, labeled, marked, packaged or disposed of on the mine site; full drums of sodium cyanide in an open air position located on the solution ponds liner, near the edge of the barren pond; various discarded lead acid batteries and tires located on the mine waste dump; chemical and petroleum product releases; transformers that may contain PCB's; and several fuel and oil storage tanks that appeared to be leaking.

All of the infractions have been effectively remediated with the exception of sampling chemical and hydrocarbon stained soil. This inspection was conducted during the sampling of these soil stains. Dave Hartshorn took the samples for Jumbo and the BLM selected some split samples (These are indicated by an asterisk \*). Sampling was done as outlined in Jumbo's sample plan, this plan had been reviewed by the BLM and by the Utah Division of Solid and Hazardous Waste. Sample sites were previously selected and staked by the BLM, these are shown on the attached map. A brief description of the samples is given below:

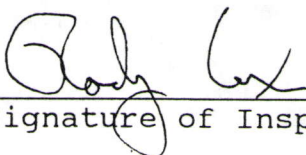
- DM-S-1: White powder from the cyanide/lime mixing tank (assayed for cyanide).
- DM-S-1A: White powder from the lime storage tank (assayed for cyanide).
- DM-S-1B: Composite sample from the cyanide/lime conveyance ditch (assayed for cyanide).
- DM-S-2A: \* Cement stored in a used cyanide barrel (assayed for cyanide and pH).
- DM-S-2B: \* Cement stored in a used cyanide barrel (assayed for cyanide and pH).
- DM-S-3: Composite hydrocarbon stained soil (assayed for heavy metals chlorinated solvents and BTEX constituents).
- DM-S-4: Composite sample from battery storage area (assayed for pH and lead).



- DM-S-5E: \* Soil from the bottom of the east side of a disposal trench containing trash and empty cyanide barrels (assayed for cyanide).
- DM-S-5W: \* Soil from the bottom of the west side of a disposal trench containing trash and empty cyanide barrels (assayed for cyanide).
- DM-S-6: \* Soil from the bottom of a disposal pit containing trash and empty cyanide barrels (assayed for cyanide).
- DM-S-7: \* White powder spill near the west side of the disposal trench (assayed for cyanide and pH).
- DM-S-8: Composite hydrocarbon stained soil (assayed for heavy metals chlorinated solvents and BTEX constituents).
- DM-S-9: \* White powder, calcium chloride, stored in a used cyanide barrel (assayed for cyanide).

Analytical results for BLM's split samples from American West Analytical Laboratories show all of the samples are at or below the detection limits and pH's within a reasonable tolerance.

Results from the company's samples were received by this office on October 13, 1995. Copies were sent to Bill Wagner, BLM S.O., D. Wayne Hedberg, UDOGM and Doug Taylor, UDEQ/DSHW to assist with the interpretation of the results. Doug Taylor called me on November 30, 1995 and suggested we require Jumbo to run a Toxic Characteristic Leaching Procedure on sample DM-S-4, which gave a value for lead of 140 ppm at a pH of 2.3. He also suggested we require Jumbo to run a Reactivity Test for sample DM-S-1A. A letter will be sent to the company requiring them to comply with these suggestions.

  
\_\_\_\_\_  
Signature of Inspector

12-1-95

\_\_\_\_\_  
Signature of Authorized Officer



**SURFACE INSPECTION  
COMPLIANCE REPORT**

Date of Inspections: May 24, 1995  
June 1, 1995

Case Serial No.: UTU-063447

Operator: Jumbo Mining Company, Drum Mine

Project Description: Cyanide Heap Leach (Non-operational Status)

Legal Description: T. 15 S., R. 10 W., Section 7 (predominantly)

District and Resource Area: Richfield/HRRA

Inspectors: Rody Cox, Doug Koza, Alan Rabinoff, Ed Bush, and Dave Hartshorn (Jumbo) on May 24th.

Rody Cox, Bill Wagner, Kimmel King, Ed Bush, Hays Griswold (EPA), and Dave Hartshorn (Jumbo) on June 1st.

Terry McParland requested that I accompany Doug Koza, Deputy State Director and Alan Rabinoff, Chief, Branch of Solid Minerals to the Drum Mine on May 24th and explain the circumstances of Jumbo's notice of noncompliance, subsequent appeal to the State Director, and remedial actions agreed to so far. During this inspection further compliance was discussed with the operator. It was agreed to by the BLM, that Jumbo would not be held to higher standards than those required by the State of Utah, Department of Environmental Quality, Division of Solid and Hazardous Waste during the sampling of chemical stains and the remediation of the barrels located on the mine waste rock dump.

I verified Jumbo's inventory of their explosive and cap magazines during this inspection, as specified and remanded to the Resource Area Manager in the BLM's State Directors Decision for Jumbo's appeal of the notice of noncompliance issued by the House Range Area Manager on April 14, 1995.

It was further requested that on June 1st, I accompany Hays Griswold, On Scene Coordinator, Environmental Protection Agency to the Drum Mine. After approximately five minutes at the Drum Mine Mr. Griswold stated he and the EPA have no additional interest in the property.

David Hartshorn submitted a plan for sampling empty cyanide drums in the disposal trenches, chemical stains on the waste dump, and cement in rinsed cyanide drums. The plan proposed to sample this material for cyanide. He was given an example of a Health and Safety Plan and was asked to submit a Health and Safety Plan prior to sampling. He was told the BLM and Utah state agencies would like to review both Jumbo's Sample Plan and Health and Safety Plan before accepting them.

A meeting between the BLM, several Utah state agencies, and Jumbo is scheduled for 12:30 pm, June 14, 1995 at the BLM State Office. The aim of the meeting is to establish acceptable procedures for conducting sampling.

  
\_\_\_\_\_  
Signature of Inspector

  
\_\_\_\_\_  
Signature of Authorized Officer



PHONE CALL/CONVERSATION CONFIRMATION

CONTACT Ed King DATE April 12, 1995  
PHONE NO. (512) 258-6608 OFFICE Jumbo Mining Co.  
SUBJECT: Notification to Ed King that Jumbo Mining Company has  
not fully complied with their notice of noncompliance.

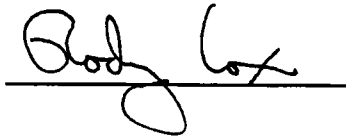
COMMENTS:

On April 12, 1995, I telephoned Ed King after receiving a FAX copy of a letter, dated April 10, 1995, that Mr. King sent to Rex Rowley, House Range Resource Area Manager. HRRR received the FAX on April 11, 1995, at 9:36 am.

In his letter (page 2, paragraph 1) Mr. King states "Together with the further action which are described below, and the various action Items which you have dropped from your March 10th letter, I believe that all items are being addressed, and that compliance with all of our demands and deadlines has been achieved. Please let me know if you feel otherwise. In any event, I understand from your April 3, 1995, page 4, that we are currently in compliance with all of your requests, and thus there is no need for a formal appeal to the March 10, 1995 Notice of NonCompliance, which otherwise would be due within 30 days of receipt of that Notice. Please notify me immediately if this understanding is not correct.

After reviewing page 4 of BLM's April 3, 1995 letter, I did not agree that Jumbo had fully complied with all the demands in that letter. I telephoned Mr. King to notify him of this. He replied by saying after further consideration, he had submitted a formal appeal of the notice of noncompliance to the BLM State Director to ensure continuation of his administrative rights. I mentioned during an inspection of the Drum Mine on April 11, 1995, Mr. Hartshorn had given me copies of both his letter to Mr. Rowley and the Notice of Appeal to the BLM State Director. I mentioned some of the State Office personnel were not available for immediate consultation and hoped we could respond to his letter to Mr. Rowley in a couple of weeks.

SIGNATURE

  
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**SURFACE INSPECTION  
COMPLIANCE REPORT**

Date of Inspection: April 11, 1995

Case Serial No.: UTU-063447

Operator: Jumbo Mining Company, Drum Mine

Project Description: Cyanide Heap Leach (Non-operational Status)

Legal Description: T. 15 S., R. 10 W., Section 7 (predominantly)

District and Resource Area: Richfield/HRRA

Inspectors: Rody Cox, Sheri Wysong; Dave Hartshorn and Don  
Galvin (Jumbo).

On March 10, 1995, Jumbo Mining Co. (Jumbo) was sent a 43 CFR 3809 notice of noncompliance (NON) for failure to reclaim and prevent undue and unnecessary degradation of Federal lands. The infractions specified in the NON are summarized below:

- Item 1: Mandated securing the site and an inventory, characterization, segregation and stabilization of materials in drums and other containers on-site. A related problem is the improper storage of full drums of sodium cyanide near the solution ponds.
- Item 2: Referenced improper storage and disposal of lead acid batteries and tires on the mine site.
- Item 3: Soil stains, possibly from multiple chemical product sources, suggesting that spillage of chemicals has occurred on the mine site.
- Item 4: Addressed the potential for classification of material in sample bags as hazardous waste.
- Item 5: Transformers on the mine site that may contain PCB's.
- Item 6: Petroleum product storage, spills and/or leaks, which may be causing unnecessary and undue degradation of Federal land and ground water.
- Item 7: Contamination of the perched aquifer located on and adjacent to the Drum Mine property.
- Item 8: Possible improper storage of potentially hazardous chemicals in the assay laboratory.
- Item 9: Required an inventory of all explosive material on the property be conducted, for product specification and usage time frames.



The NON required documentation the item cited is not in noncompliance or remediation of the item. The NON specified "immediate corrective action must include the securing of the site and an inventory, characterization, segregation and stabilization of materials in drums and other containers on-site. This response action must, at a minimum, comply with the requirements of the National Contingency Plan, the provisions of the Hazardous Waste Operations for Emergency Response and the OSHA requirement in 29 CFR 1910.120 for the protection of response personnel."

Corrective actions taken by Jumbo and discussed with the BLM at the March 20, 1995 inspection, included having a MSHA electrician examine the power transformers for dielectric fluid (PCBs) and verify none are present (Item 5); inventory of the powder and cap magazines for outdated explosive materials, none were reported (Item 9); Dave Hartshorn, Project Geologist at the Drum Mine said two of their workers (himself and Don Galvin) inventoried, characterized, and segregated the material in drums on the waste dump (Item 1). These workers also collected the old lead acid batteries on a pallet for recycling, and we discussed their plans for disposal of the tires (Item 2). During this inspection one broken lead acid battery was observed inside a trench along with empty drums of unidentified origin and unknown chemical and petroleum product releases.

On April 3, 1995, a letter was sent to Jumbo reviewing their remedial actions. Along with the review, the letter emphasized that the BLM required a third party, not Jumbo, to test the contents of a representative number of the barrels and soil stains. The letter also specified that storage of drums containing sodium cyanide must comply with the U.S. Department of Labor Mine Safety and Health Administration (MSHA), Work Practice Guidelines, for storage of cyanide mill reagents. In response to the lead acid battery and discarded drums disposed of in the trench, the April 3, 1995 letter required the waste in the disposal trenches to be sampled and characterized under the supervision of the BLM or the State of Utah, Division of Solid and Hazardous Waste.

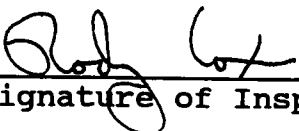
The April 11, 1995 inspection was to verify any additional corrective action(s) Jumbo had taken in response to their NON. During this inspection we observed their employees were in the process of cleaning and maintaining the assay laboratory (Item 8). We were shown the location in the mill where Jumbo now proposes to store the full drums of sodium cyanide. Mr. Hartshorn felt this location would completely conform to MSHA's Work Practice Guidelines, for storage of cyanide mill reagents. As a temporary measure this location may be preferable to the present open air location on the barren pond liner. Mr. Hartshorn mentioned Jumbo had contacted Jim Martin at the State of Utah, Department of Environmental Quality, Division of Environmental Response and Remediation for compliance with underground storage tank regulations. He said Jumbo's contractor

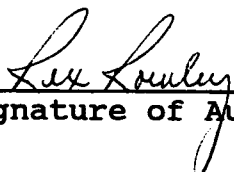


for the design of the recently proposed heap had written a letter to the State of Utah, Department of Environmental Quality, Division of Water Quality to continue the permitting process. A copy of this letter was obtained and is attached to this inspection report. The submittal of a modified plan of operations, as required in the NON, was discussed. Mr. Hartshorn requested the BLM send a letter to Mr. King, Jumbo's President outlining the information that should be addressed in this submittal. We were given a copy of recent correspondence from Jumbo to Rex Rowley, House Range Resource Area Manager (Attached) and a copy of Jumbo's Notice of Appeal for their NON (Attached).

We visited the mine waste dump and Mr. Hartshorn asked if the discarded samples (Item 4) could be buried in a trench on the waste dump. I told him they could, but requested that they not cover over the trench until the other noncompliance issues are resolved.

Jumbo seems willing to comply with most of the mandates in the NON. The greatest points of contention are over hiring a third party contractor to sample barrels and soil stains, as well as, their legal responsibility for remediation of the perched aquifer. At the time of this inspection they had not corrected nor complied with every Item in the notice of noncompliance.

  
Signature of Inspector

  
Signature of Authorized Officer



**SURFACE INSPECTION  
COMPLIANCE REPORT**

Date of Inspection: March 20, 1995

Case Serial No.: UTU-063447

Operator: Jumbo Mining Company, Drum Mine

Project Description: Cyanide Heap Leach (Non-operational Status)

Legal Description: T. 15 S., R. 10 W., Section 7 (predominantly)

District and Resource Area: Richfield/HRRRA

Inspectors: Rody Cox, Bill Wagner, Ed Bush, (BLM); Wayne Hedberg, Tom Munson (DOGM); Jason Knowlton (DERR); Mark Novak (DWO); Doug Taylor, Jeff Vandel, Eric Baiden (DSHW); Kimmel King (Rinchem); Dave Hartshorn (Jumbo).

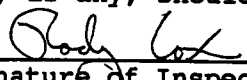
On February 16, 1995, Ed Bush, Kimmel King and I visited the Drum Mine. During this inspection concerns were raised over notable quantities of materials that could be subject to identification and listing as hazardous waste under the 40 CFR 261 regulations.

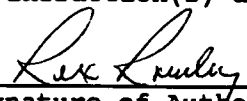
These are drums of abandoned or discarded chemical products, which appeared improperly stored, labeled, marked, packaged or disposed of on the mine site; full drums of sodium cyanide in an open air position located on the solution ponds liner, near the edge of the barren pond; various discarded lead acid batteries and tires located on the mine waste dump; chemical and petroleum product releases; transformers that may contain PCB's; and several fuel and oil storage tanks that appeared to be leaking.

On March 10, 1995, a notice of noncompliance (NON) was sent to Jumbo Mining Company (Jumbo) addressing these issues and requiring their remediation. The NON specified "immediate corrective action must include the securing of the site and an inventory, characterization, segregation and stabilization of materials in drums and other containers on-site. This response action must, at a minimum, comply with the requirements of the National Contingency Plan, the provisions of the Hazardous Waste Operations for Emergency Response and the OSHA requirement in 29 CFR 1910.120 for the protection of response personnel."

This inspection verified what corrective actions Jumbo had taken in response to their NON. The corrective actions included having a MSHA electrician examine the power transformers for dielectric fluid (PCB's) and verify none are present; inventory of the powder and cap magazines for outdated explosive materials, none were reported; also, Dave Hartshorn, Project Geologist at the Drum Mine said two of their workers (himself and Don Galvin) inventoried, characterized, and segregated the material in drums on the waste dump. Four handouts (Attached) were distributed to the inspectors, which included Jumbo's proposed remediation plan for the barrels on the waste dump. The inspection also revealed at least one lead acid battery was disposed of inside a trench (in violation of Resource Conservation Recovery Act, RCRA), empty drums of unidentified origin and unknown chemical and petroleum product releases. The releases are a violation of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), 40 CFR 372.3. Photographs (Attached) were taken to document conditions on the ground. A map of the facility (drafted by DOGM) is attached to this report for orientation.

A meeting will be held at the Division of Oil Gas and Mining on March 27, 1995, with the various concerned agencies to formally determine if Jumbo's response was appropriate and in compliance with the directives in the NON. If not, the severity of the infraction(s) and resulting disciplinary action, if any, should be decided.

  
Signature of Inspector

  
Signature of Authorized Officer



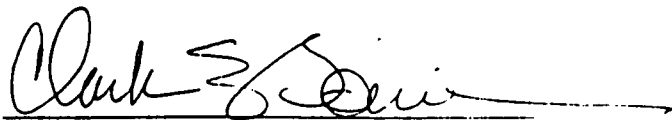
03/15/95  
C.E. Bowen  
P.O. Box 293  
Eureka, UT 84628  
801-433-6847

Sirs:

I inspected the Drum Mine power system and found the following transformers:

1. G/S Transformer      Dry air cooled  
S5H25      Series D  
LV 240/120 VAC  
25KVA  
No serial number
2. Acme Transformer      Dry air cooled  
T-1A-S3312-35      Style G  
SV 480/120 VAC  
30 KVA
3. International Transformer      Dry air cooled  
Cat # 37S73H6  
37.5 KVA at 240/480 - 120/240 VAC  
SN # 14876
4. MGM Transformer      Dry air cooled  
100KVA at 240/480 - 120/240VAC  
SN # 8303-100SD-002-2
5. MGM Transformer      Dry air cooled  
9KVA @ 240/480 - 120/240VAC  
SN # 8303-90-008-1      CAT # T9A3K2
6. MGM Transformer      Dry air cooled  
225KVA @ 240/480 -120/240VAC  
Cat # T225A3A2

There is no cooling oil used in any of the transformers on site. They are the dry type units, thus no PCB's are present on the sites electrical system



C.E. Bowen  
423388667  
MSHA Elec. L/M Volt Sur  
MSHA Elec. High Volt U/S



March 17, 1995

### POWDER MAGAZINE INVENTORY

205 bags ANFO (ammonium nitrate)

1 box safety fuse

9 boxes (2000' ea) E-cord

9 boxes (2000' ea) D-cord

5 boxes 1/2 & 1 pound boosters

1/2 box fuse lighters

#### NOTES:

1. All material have indefinite shelf life if kept dry (verification can be obtained from Burt Explosives)
2. All powder (1x8 dynagel sticks) have been destroyed

### CAP MAGAZINE INVENTORY

3 boxes 25MS delays

1 1/2 boxes #6 caps



March 17, 1995

DRUM MINE WASTE DUMP BARREL INVENTORY

1. RETURNABLE PLASTIC BARRELS--53 TOTAL

2 Muriatic acid  
37 black caustic  
4 blue caustic  
10 Millsperse

2. BARRELS CONTAINING CEMENT--18 TOTAL

3. RETURNABLE EMPTY CHEVRON OIL BARRELS--7 TOTAL

4. EMPTY OIL AND ANTIFREEZE BARRELS--42 TOTAL

5. BARRELS WITH PARTIAL PETROLEUM PRODUCT CONTENT--37 TOTAL

SUBTOTAL OF BARRELS ON WASTE DUMP = 157

OTHER BARRELS

5 TRASH/BURN BARRELS

NUMEROUS RINSED CYANIDE BARRELS IN WASTE DISPOSAL TRENCH



BARREL REMEDIATION FOR THE 157 BARRELS ON WASTE DUMP

PLASTIC BARRELS--return to supplier

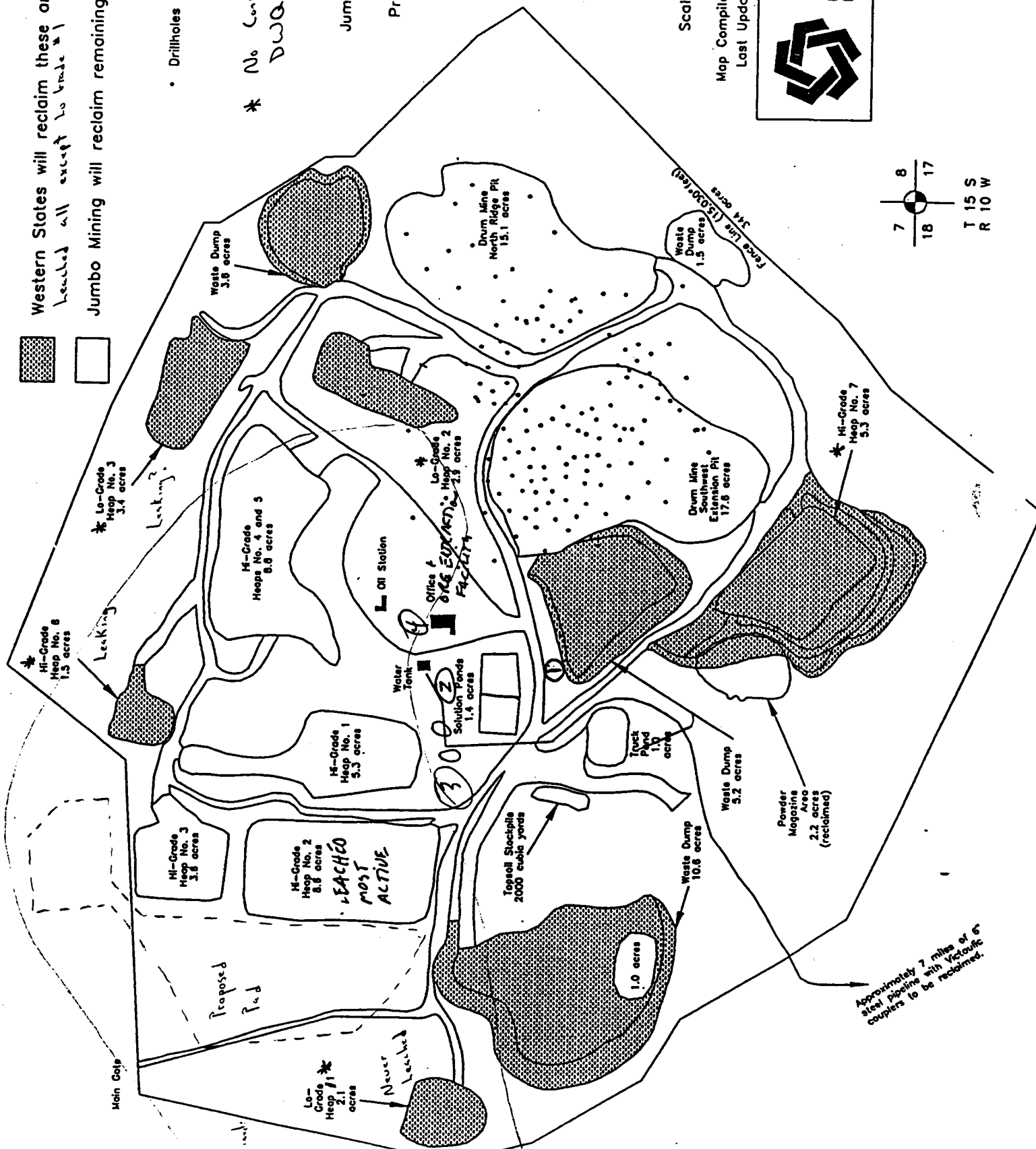
CEMENT BARRELS--use cement for reclamation (drill hole  
plugging, etc.) and dispose of barrels in  
permitted disposal trench

CHEVRON BARRELS--return to Sperry Oil in Delta

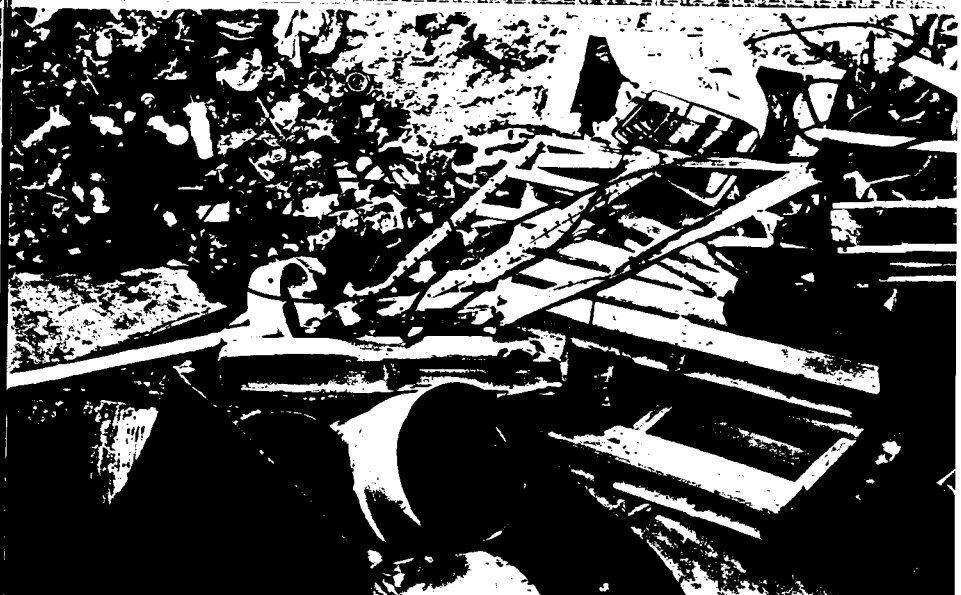
EMPTY OIL/ANTIFREEZE BARRELS--steanclean and dispose on  
site or haul to recycling center

PARTIALLY FILLED OIL BARRELS--haul to Ag Center in Delta for  
disposal

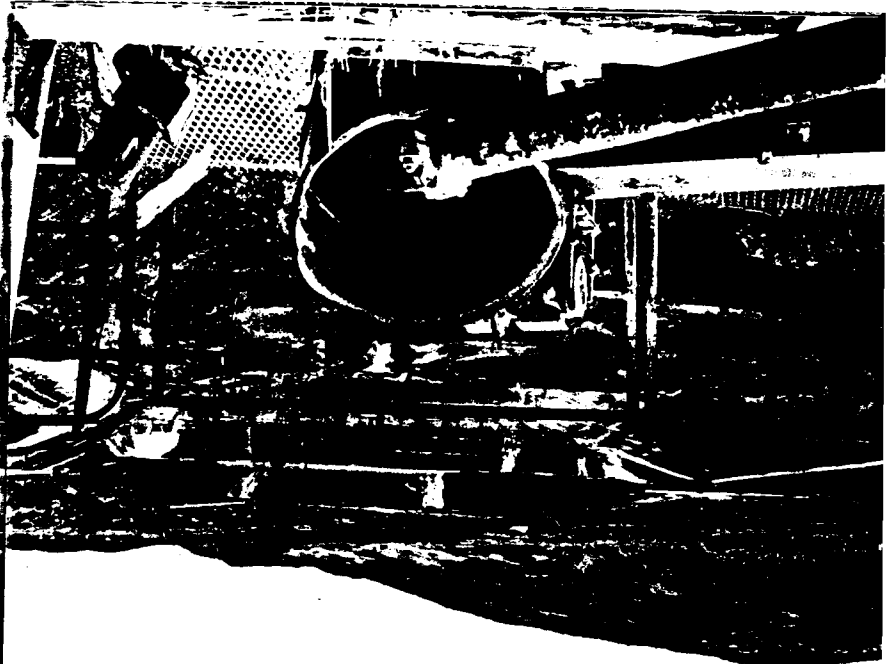
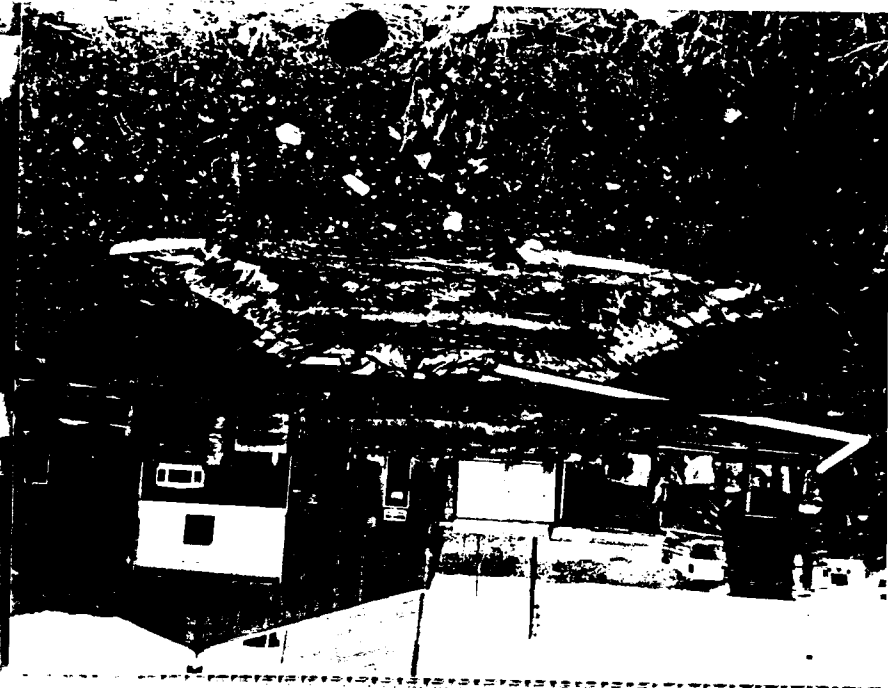












Deon Mine V-63447  
 TISS RUCW Sec. 7  
 # 2 Highgrade Heap of  
 Collection Ditch  
 Note: Look Direction N152W  
 3-20-15 G.L.K.





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PHONE CALL/CONVERSATION CONFIRMATION

CONTACT Ed King DATE March 15, 1995

PHONE NO. ( 512 ) 258-6608 OFFICE Jumbo Mining Co.

SUBJECT Decision for 3809 Surface Management Notice of

Noncompliance to Jumbo Mining Co., Drum Mine, dated March 10, 1995

COMMENTS:

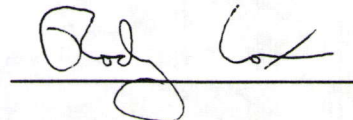
On March 14, 1995, I received a FAX of a letter dated March 13, 1995, from Kimmel King of Rinchem to Ed King at the Jumbo Mining Company (Jumbo). The letter offered Rinchem's services to remediate some potential problems at the Drum Mine, discussed in their notice of noncompliance (NON). Later that day I called Ed King to see if he had any questions concerning the noncompliance. He was not in and I left a message on his answering machine. Mr. King returned my call after I left work.

At approximately 9:30am on March 15, 1995, I called and spoke to Ed King over the telephone. Mr. King mentioned that he was drafting a letter in response to the notice of noncompliance. I told him several people (Jason Knowlton, DERR; Mark Novak, DWQ; Doug Taylor, DSHW; and Wayne Hedburg, DOGM) from Utah state regulatory agencies were interested in visiting the Drum Mine in the near future. Mr. King said he would FAX HRRA a draft of the letter prior to the proposed site visit.

Ed King asked if I could clarify a statement in Kimmel King's letter to him. The statement reads "Rinchem Company, Inc. is the sole-source contractor for environmental emergency response and remediation projects on the 21 million acres of public lands that are administered by the BLM in the state of Utah." I said Rinchem has an exclusive contract with the BLM in the state of Utah to remediate sites on public land. Furthermore, I stated this does not mean that Jumbo has to hire Rinchem to conduct remediation at the Drum Mine, enclosed with the NON was a list of 17 other Haz-Mat remediation contractors in the state of Utah who are certified and authorized to conduct this type of operation. I emphasized, the BLM is not endorsing nor recommending any specific company to perform these services.

Ed King stated Dave Hartshorn assured him many of the 157 drums referenced as an imminent threat in the NON had been properly rinsed and handled. Mr. King asked if the mine caretaker and geologist could take care of problems at the Drum Mine. I told him that I was not very familiar with Haz-Mat procedures and suggested that he call Bill Wagner, Hazardous Material Management Specialist, at the BLM State Office for information regarding the appropriate procedures.

SIGNATURE





**SURFACE INSPECTION  
COMPLIANCE REPORT**

Date of Inspection: March 9, 1995

Case Serial No.: UTU-063447

Operator: Jumbo Mining Company, Drum Mine

Project Description: Cyanide Heap Leach (Non-operational Status)

Legal Description: T. 15 S., R. 10 W., Section 7 (predominantly)

District and Resource Area: Richfield/HRRA

Inspector: Rody Cox, Wayne Hedberg, Tony Gallegos, Lynn Kunzler,  
Tom Munson (UDOGM), and Dave Hartshorn (Jumbo)

REPORT NARRATIVE (REFERENCE STIPULATIONS BY NUMBER OR TITLE)


In 1988, Jumbo Mining Company (Jumbo) acquired the Drum Mine from Western States Minerals Corporation (Western States). Subsequent litigation, in Colorado District Court, over the transfer of reclamation responsibility ensued. One of the issues is approximately 55,000 cyd of topsoil to be used for reclamation. The majority of this topsoil was never excavated by Western States, however; the District Court ruled, since Jumbo was aware of this problem during acquisition, they should be responsible for the topsoil.


In compliance with the Courts ruling, Jumbo recently contacted the Division of Oil Gas and Mining (UDOGM) and informed them sufficient topsoil exists on the property to make up for the deficit. Jumbo identified this material by trenching and volumetric estimations. The purpose of this inspection was to verify Jumbo's estimates.

Attached is a copy of a map that shows the location of current topsoil stockpiles. Areas 1-6 are current topsoil stockpiles. The total volume of stockpiled topsoil present in areas 1-6 is approximately 8,500 cyds. The map also shows the locations of the trenches, areas proposed for topsoil salvage, the average estimated depth for each of these areas, the acres in each of these areas, and the cubic yards of top soil proposed for salvage associated with each of these areas. Areas A-J are the areas proposed for topsoil salvage. The total volume of topsoil proposed for salvage present in areas A-J is approximately 48,700. The combined total of topsoil would be approximately 57,200 cyds, which exceeds the amount currently required for reclamation (55,000 cyds).

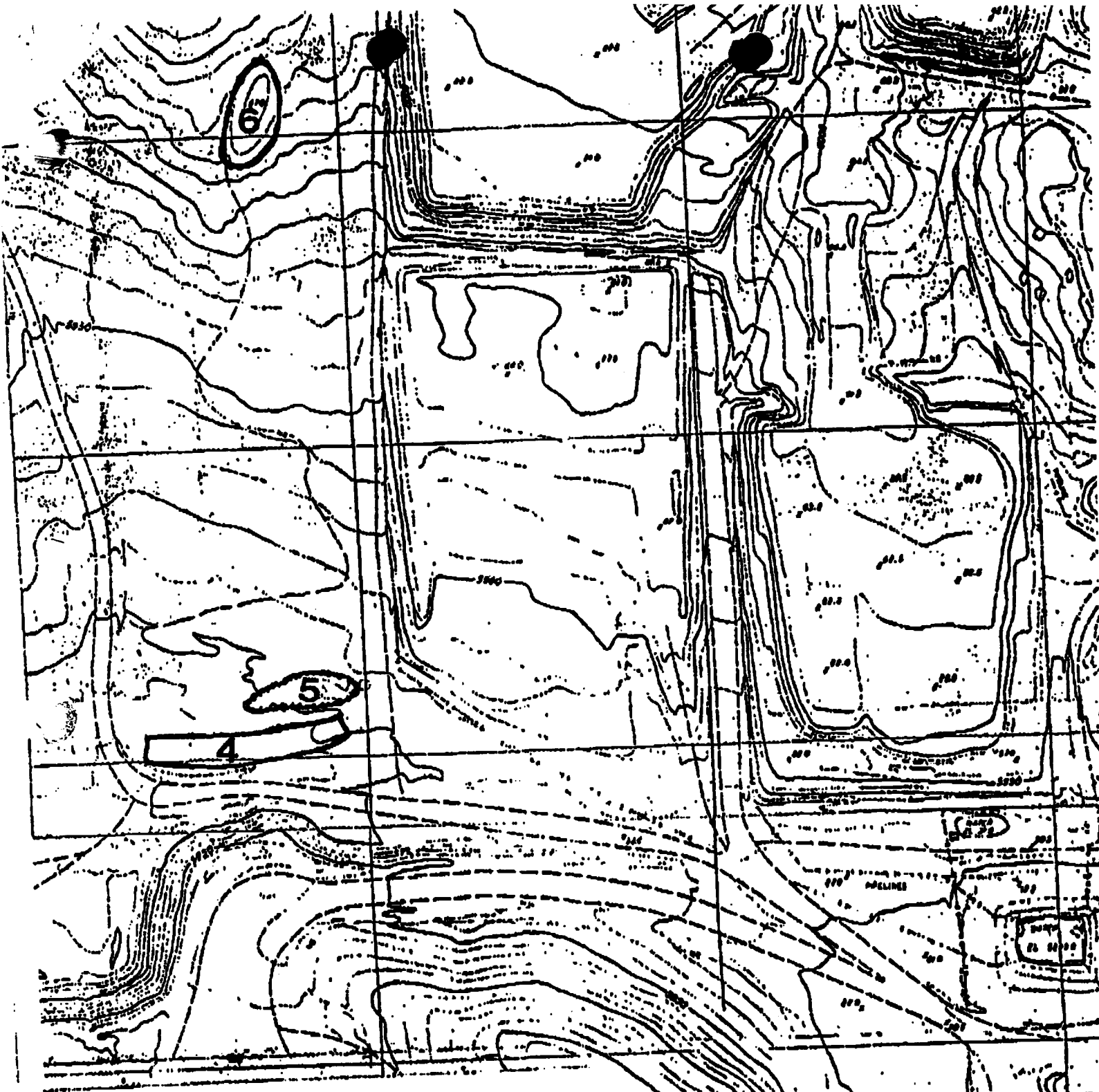


This inspection confirmed that Jumbo's estimates appear reasonable. The "topsoil" is composed of multiple soil horizons and may not be as productive as just the "O" plus "A" horizons. Because these horizons comprise just a thin veneer at this location, Jumbo is justified in proposing to use augmented soil horizons for reclamation purposes. A soil analysis needs to be completed prior to allowing Jumbo to excavate and stockpile the proposed topsoil. It is recommended several analysis be done. At minimum one from each soil horizon and one composite sample from construction fill near the mill and/or process ponds. These analysis will help to identify any soil deficiencies, as well as amendments that may be used to increase productivity, hence facilitate reclamation.

  
\_\_\_\_\_  
Signature of Inspector

  
\_\_\_\_\_  
Signature of Authorized Officer





ATTACHMENT 1

**RECEIVED**  
FEB - 8 1995  
DIV OF OIL, GAS & MINING

**SOIL STOCKPILE AREAS  
DRUM MINE**

Area 1 = 2,600 yards

Area 2 = 1,800 yards

Area 3 = 100 yards

Area 4 = 1,300 yards

Area 5 = 800 yards

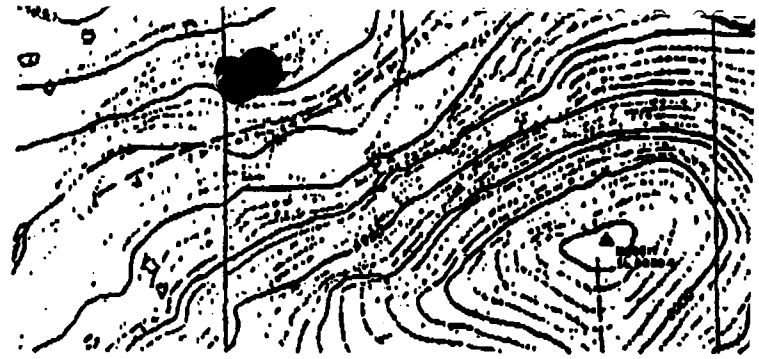




Area 8 = 2,200 yards

TOTAL = 8,500 yards

1" = 200'



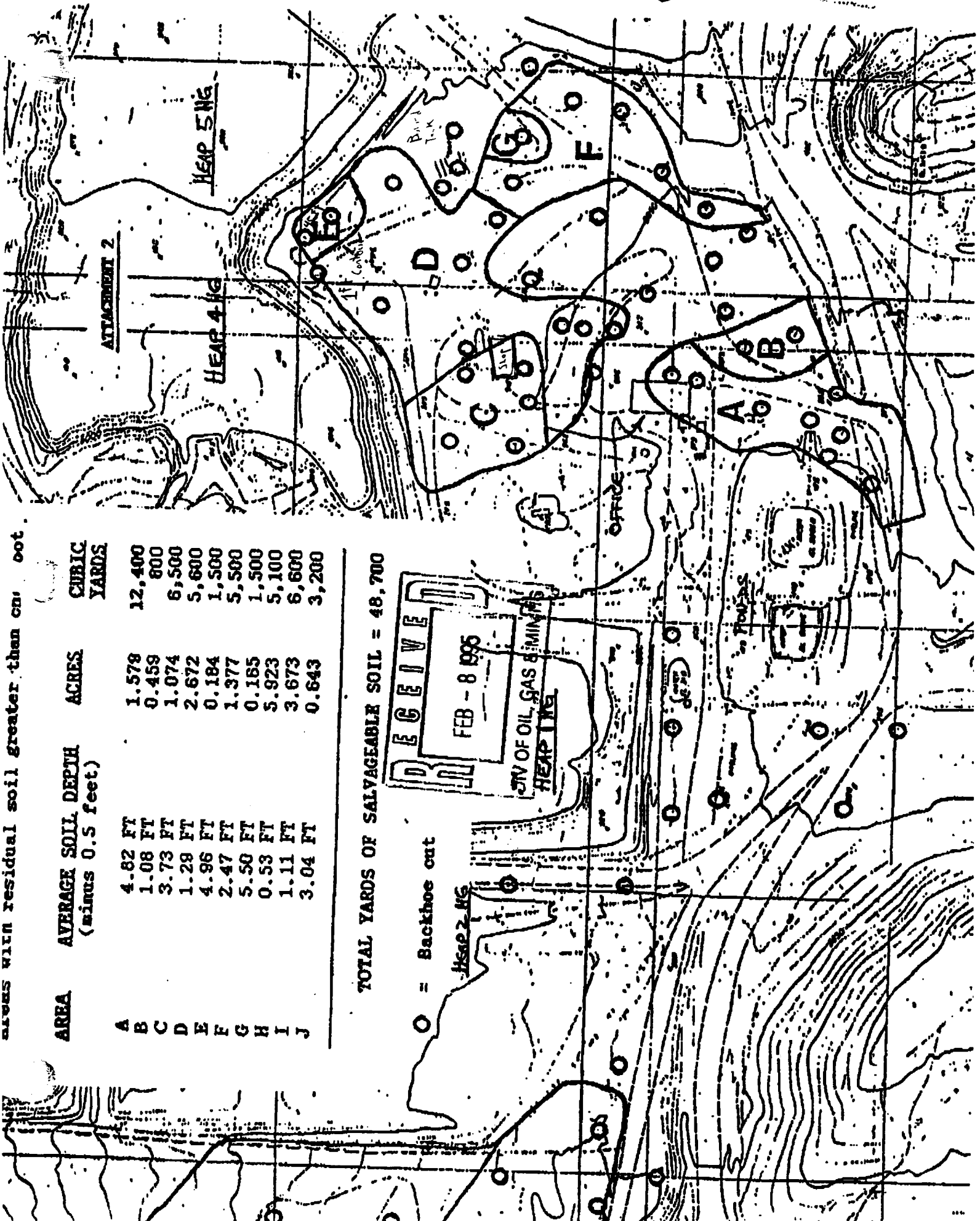
500 ft

Deficit ~ 55,000 yd<sup>3</sup> of Topsoil

47,800 proposed

8,500 inventory





AREAS WITH residual soil greater than cm. out.

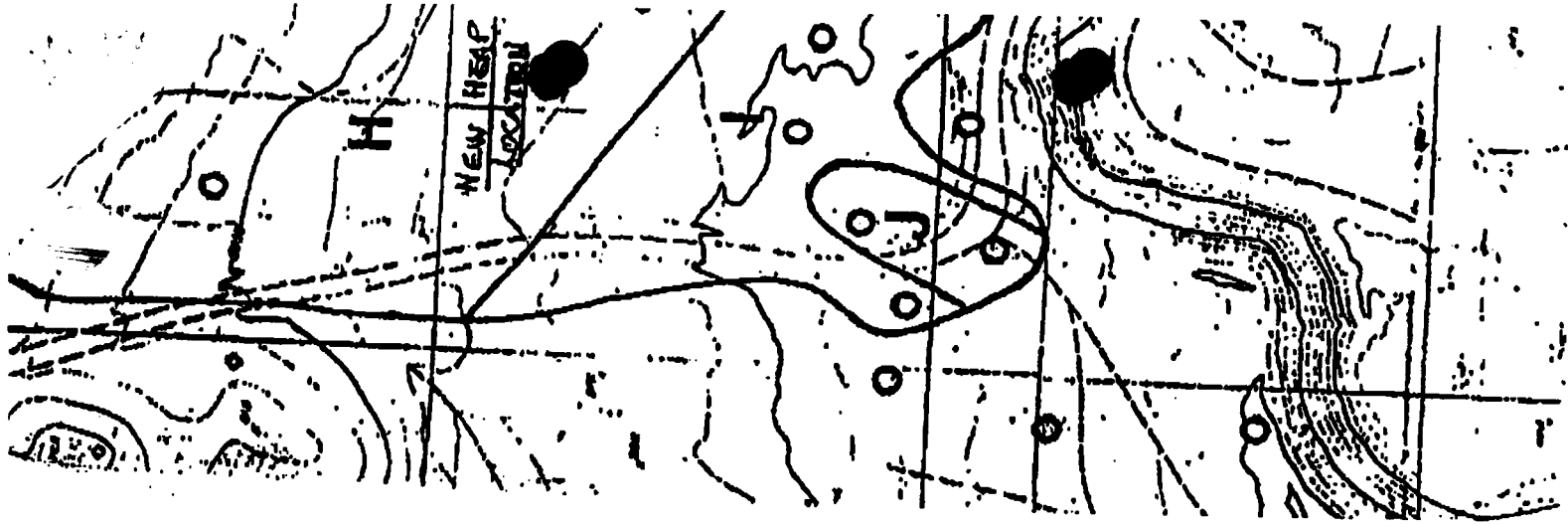
AREA	AVERAGE SOIL DEPTH (minus 0.5 feet)	ACRES	CUBIC YARDS
A	4.82 FT	1.578	12,400
B	1.08 FT	0.459	800
C	3.73 FT	1.074	6,500
D	1.29 FT	2.672	5,600
E	4.96 FT	0.184	1,500
F	2.47 FT	1.377	5,500
G	5.50 FT	0.185	1,500
H	0.53 FT	5.923	5,100
I	1.11 FT	3.673	6,600
J	3.04 FT	0.643	3,200

TOTAL YARDS OF SALVAGEABLE SOIL = 48,700

O = Backhoe out

RECEIVED  
FEB - 8 1995  
DIV OF OIL, GAS & MINING  
HEAPING







Main Gate

Approximate

Proposed  
Road

Le-Grade  
Heap No. 1  
2.1 acres

Never  
Leaked

Hi-Grade  
Heap No. 3  
3.8 acres

Hi-Grade  
Heap No. 2  
8.8 acres  
EACHED  
MOST  
ACTIVE

Hi-Grade  
Heap No. 1  
5.3 acres

Water  
Tank  
Solution Ponds  
1.4 acres

Oil Station

Office &  
Drum Extension  
Facility  
Lo-Grade  
Heap No. 2  
2.9 acres

Hi-Grade  
Heap No. 8  
1.5 acres

Leaking

Lo-Grade  
Heap No. 3  
3.4 acres

Leaking 2

Hi-Grade  
Heaps No. 4 and 5  
8.8 acres

Waste Dump  
3.8 acres

Drum Mine  
North Ridge Pit  
15.1 acres

Topsoil Stockpile  
2000 cubic yards

1.0 acres

Waste Dump  
10.8 acres

Truck  
Pond  
1.0 acres

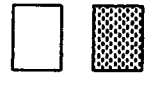
Waste Dump  
5.2 acres

Powder  
Magazine  
Area  
2.2 acres  
(reclaimed)

Drum Mine  
Southwest  
Extension Pit  
17.8 acres

Hi-Grade  
Heap No. 7  
5.3 acres

Waste  
Dump  
1.5 acres  
Fence Line (1500 feet)  
3.4 acres



Western States will reclaim these areas (41.8 acres).  
Leaked all except to lands #1  
Jumbo Mining will reclaim remaining areas (83.9 acres).

Drillholes

\* No Contribution Permit from  
DWA

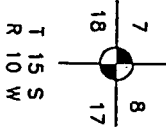
Jumbo Mining Company  
M/027/007  
Drum Mine Site  
Present Disturbance

Scale: 1" = 600'

Map Compiled December 5, 1988  
Last Update: July 26, 1989



State of Utah  
Department of Natural Resources  
Division of Oil, Gas and Mining



Approximately 7 miles of 6" steel pipeline with valve/couplers to be reclaimed.



**SURFACE INSPECTION  
COMPLIANCE REPORT**

Date of Inspection: February 16, 1995

Case Serial No.: UTU-063447

Operator: Jumbo Mining Company, Drum Mine

Project Description: Cyanide Heap Leach (Non-operational Status)

Legal Description: T. 15 S., R. 10 W., Section 7 (predominantly)

District and Resource Area: Richfield/HRRA

Inspector: Rody Cox, Ed Bush, Kimmel King (Rinchem), and  
Don Gavin (Jumbo)

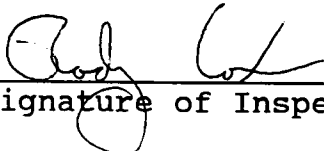
REPORT NARRATIVE (REFERENCE STIPULATIONS BY NUMBER OR TITLE)

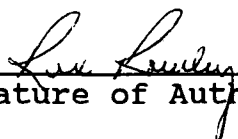
Prior to arriving at the Drum Mine, Ed Bush, Kimmel King and I visited near the Black Boy Mine in T. 14 S., R. 11 W., Sec. 25. This property was mined for manganese by the Department of Defense (DOD). They would like to turn the property back over to BLM, but first need to complete reclamation. Somehow the record was confused and the site recorded as a magnesium mine. Magnesium is a highly reactive metal. Kimmel King was present to sample some "ore" stockpiles and confirm the presence of manganese not magnesium. This task was accomplished.

Next we went to the Drum Mine because Ed Bush and Kimmel King were curious and wanted to see what activities were being conducted during the present period of non-operations. During this inspection concerns were raised over significant quantities of materials subject to identification and listing as hazardous waste under the 40 CFR 261 regulations.

There are drums of abandoned or discarded chemical products, which appeared improperly stored, labeled, marked, packaged or disposed of on the mine site; full drums of sodium cyanide in an open air position located on the solution ponds liner, near the edge of the barren pond; various discarded lead acid batteries and tires located on the mine waste dump; two transformers that might contain PCB's; and several fuel and oil storage tanks that appeared to be leaking.

Ed Bush and Kimmel King decided to return the following day to complete an inventory of possible problems related to Haz Mat and 43 CFR § 3809 compliance issues.

  
Signature of Inspector

  
Signature of Authorized Officer



SURFACE INSPECTION  
COMPLIANCE REPORT

Date of Inspection: April 14, 1993

Case Serial No.: UTU-063447 formerly UT-056-07P, -A-B

Operator: Jumbo Mining

Project Description: Cyanide Heap Leach Mining

Legal Description: T. 14 and 15 S., R. 10 and 11 W., Sec. 35,  
36, 6, 7, 8, 1

District and Resource Area: Richfield/House Range


Inspector: Rody Cox

REPORT NARRATIVE (REFERENCE STIPULATIONS BY NUMBER OR TITLE)

On April 14, 1993, a joint inspection between the Bureau of Land Management (BLM) and the Utah Division of Oil Gas and Mining (UDOGM) was conducted at Jumbo Mining Company's Drum Mine. In attendance was David Hartshorn, Jumbo Mining; D. Wayne Hedberg, Lowell Braxton and Tom Mitchell, UDOGM; and Rody Cox, BLM.

Recently a partial decision was rendered by the Colorado Court concerning a civil suit between Jumbo Mining Company and Western States Mining Company. The court decided the wording (transferor instead of transferee) in the contract for sale of the Drum Mine was an unintentional mistake. The result is Jumbo has additional liability for reclamation. Jumbo claims they will appeal the ruling when a full decision is certified. Western States has petitioned UDOGM to release their reclamation bond. One of the goals of this inspection was to have Tom Mitchell, an attorney for UDOGM, get a general overview of the mine site and operations. The total area disturbed by operations at the Drum mine is about 120 acres. None of the heap leaches are currently permitted (heaps 1-5 were permitted through 1990) and DWQ has required Jumbo to rebuild the solution ponds before operations can resume. Mr. Mitchell indicated UDOGM does not intend to release Western State's bond in the near future.

A tour of the Drum Mine was conducted by David Hartshorn and included visits from the office to, Lo-Grade No. 3 heap, No. 1 and No. 2 pits along with the topsoil stockpile, which is deficient in approximately 50,000 cyds. Two re-vegetation test plots were inspected. The test plots presented showings of Halogeton, also some grasses and forbs that were too small to distinguish the species. Areas on federal land inspected away from the Drum Mine included the Mizpah Pit, drill sites near Joy and a proposed topsoil barrow area. Sites visited on state and private land included the Alto, Monarch and Clara B pits.

  
Signature of Inspector

  
Signature of Authorized Officer



PHONE CALL/CONVERSATION CONFIRMATION

CONTACT Don Gavin DATE February 24, 1995  
PHONE NO. ( 801 ) 864-864-4697 OFFICE Drum Mine, Caretaker  
SUBJECT Letter Warning of Potential Hazards to Drum Mine Workers

COMMENTS: Terry McParland, S.O., Geologist, informed me the S.O. was drafting a letter to warn employees at the Drum Mine about what the BLM believes to be potentially hazardous storage conditions for some of the chemicals at that location.

Afterwards, I spoke with Don Gavin, Drum Mine, Caretaker, and informed him of some of our concerns and told him to expect a letter from the BLM elucidating some potentially hazardous conditions at the Drum Mine.

These conditions were observed on February 16, 1995, by Ed Bush, Rody Cox (BLM), and Kimmel King (Rin Chem) on site at the Drum Mine. Initial concerns are over the storage of sodium cyanide, hydrochloric acid, and other possible contaminants. The Fillmore Office received A FAX, on February 22, 1995, of a preliminary Hazardous Material assessment report for the Drum Mine, written by Kimmel King.

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PHONE CALL/CONVERSATION CONFIRMATION

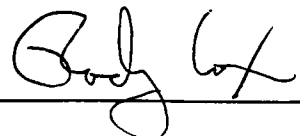
CONTACT David Hartshorn DATE February 27, 1995  
PHONE NO. ( 801 ) 864-864-4697 OFFICE Drum Mine, Geologist  
SUBJECT Letter Warning of Potential Hazards to Drum Mine Workers

COMMENTS: On February 27, 1995, Terry McParland, FAXED me a draft of a letter warning employees at the Drum Mine about what the BLM believes to be potentially hazardous storage conditions for some of the chemicals at that location.

Afterwards, I spoke with David Hartshorn, Drum Mine Geologist, and summarized the contents of the letter for him. (Previously on February 24, 1995, I had left a short message on his answering machine.) I informed him to expect a letter from the BLM elucidating some potentially hazardous conditions at the Drum Mine.

These conditions were observed on February 16, 1995, by Ed Bush, Rody Cox (BLM), and Kimmel King (Rin Chem) on site at the Drum Mine. Initial concerns are over the storage of sodium cyanide, hydrochloric acid, and other possible contaminants. The Fillmore Office received A FAX, on February 22, 1995, of a preliminary Hazardous Material assessment report for the Drum Mine, written by Kimmel King.

SIGNATURE



2-28-95



**SURFACE INSPECTION  
COMPLIANCE REPORT**

Date of Inspection: 9/02/92

Date of Report: 9/25/92

Case Serial No.: UT-056-7P

Operator: Jumbo Mining Company

Project Description: Heap Leach Mine

Legal Description: T. 15 S., R. 10 W., Sec. 7

District and Resource Area: Richfield/House Range

Inspector: Michael Jackson

REPORT NARRATIVE (REFERENCE STIPULATIONS BY NUMBER OR TITLE)

On this date, I visited the Drum Mountain Mine in conduct of a ground water evaluation of Busby Spring. I was accompanied by Phil Zieg, Harvey Gates, and Boyd Christensen, BLM employees. We checked in at the mine office but the Mine Manager was in the field.


At the gate to the Drum Mine, several signs to restrict access to the mine area were posted. (See attached photographs.) These included signs for private property, no trespassing and posted land. Signs posted to restrict access to unpatented mining claims should be approved by the authorized officer of the BLM. The mine south and east of this gate is located on unpatented mining claims. A lock is also present on the gate, although it was not locked at this time.

Appropriate signs related to this mining operations should be approved by the AO.

Also, it was noted that fluid is retained in the pregnant and barren ponds. Bureau policy, IM 90-566, requires that cyanide solution be neutralized upon temporary closure (any cessation that exceeds 30 days). Since mining has not occurred in two years, these ponds are probably detoxified, however, the BLM should verify that the fluid in these ponds is nontoxic.

The operator has also completed some recent backhoe work to develop the spring. I am not aware of the work being covered under the plan of operations and an application to appropriate water was not approved by the State Engineer.

  
Signature of Inspector

  
Signature of AO

Attachment: 4 photos



## 3809 FIELD INSPECTION FORM

DATE OF INSPECTION Aug. 6, 1991 TIME 14:00 CASE SERIAL NO. UT-056-7PLOCATION: Township 14S, 15S, Range 10W, 11W, S.L.M.  
Section 35, 36, Subdivision \_\_\_\_\_  
Section 6, 7, 8, 9, Subdivision \_\_\_\_\_INSPECTOR C. Red, R. Cox DISTRICT & RESOURCE AREA Richfield / House Range

Claimant Name \_\_\_\_\_ Present During Inspection: Yes / No

Operator Name Jumbo Mining Present During Inspection: (Yes) / NoOthers at Inspection: Michael Jackson (ROD); Holland Shepherd (DOGM); David Martin (Jumbo)Is the Operation Active? non-active statusMSHA PERMIT NO. unknown Is Permit Current? unknown

DOE PERMIT NO. \_\_\_\_\_ Is Permit Current? \_\_\_\_\_

DNR PERMIT NO. \_\_\_\_\_ Is Permit Current? \_\_\_\_\_

COUNTY SANITATION PERMIT NO. \_\_\_\_\_ Is Permit Current? \_\_\_\_\_

OTHER PERMITS: unknownIndicate type of operations being conducted: (taken from 3/18/90)

## EXPLORATION

- ☐ Claim staking
- ☐ Clearing of timber or other vegetation
- ☒ Drill pads
- ☒ Drill holes (Plugged? yes / no)
- ☐ Trenches
- ☐ Test Pits
- ☐ Bulk Sampling Sites
- ☐ Reopened Old Adits/Shfts
- ☐ (Gated? yes / No)
- ☐ New Adits/Shfts (Gated? Yes / No)
- ☐ Explosive Use or Storage
- ☒ New Roads Constructed
- ☐ Other (Describe on General Comments)

## MILLING

- ☒ Milling or Processing Facilities
- ☒ Leaching Pad and/or Ponds
- ☒ Powerlines
- ☒ Hazardous Materials Present
- ☒ Fuel Tanks (☒ Above/☒ Below Ground)
- Amount Stored \_\_\_\_\_ gallons or cf
- Is Site Lined? NO Bermed? yes
- ☐ Additional Roads
- ☐ Other (Describe on General Comments)

## MINING

- ☒ Underground Mine (Gated? Yes / No)
- ☒ Mine Dumps
- ☒ Surface Mine
- ☒ Placer Mine
- ☐ Tailings Pond
- ☒ Ore Stockpile
- ☒ Overburden Stockpiles
- ☒ Waste Stockpiles
- ☒ Vehicle Yarding Area
- ☒ Adits/Shfts in Operation
- ☐ Explosives Use or Storage
- ☐ New Roads Constructed
- ☒ Hazardous Materials Stored or in Use.
- ☐ Other (Describe on General Comments)

## STRUCTURES

- ☒ Temporary Camp Trailers
- ☒ Buildings on Skids
- ☒ Structures or Bldgs. Affixed to Land
- ☐ Other Camp Facilities
- ☐ Sanitary Facilities
- ☒ Full Time Occupancy of Site
- ☒ Seasonal or Temporary Occupancy
- ☒ Occupancy Identified in Notice/Plan
- ☐ Other (Describe on General Comments)



ACCESS:

Is public access allowed through site (e.g., no gates)? NO

Describe how access is blocked: gate at entrance, signs posted

Describe the location of all new and existing access routes considered to be part of this project area and show their locations on the attached inspection map:

the road network of the mine is shown on an attached map of the mine area

Describe the specifications of the roads (length, width of roadbed, total disturbed width from top of cuts to toe of sidecast, type of surfacing, presence and frequency of berms, ditches, culverts, water bars, etc.): the roads are gravel

covered - not kept up because of non-active status

Are any of the road cuts greater than 3 feet on the inside edge? Was this mentioned in the notice/plan? yes, yes

Was topsoil saved and stockpiled? Yes / No / Not enough available

Describe all equipment found on site: the topsoil debate is still in court Western States Minerals and Junco will be in court in October

OPERATIONS:

Is the operation causing obvious erosion or other degradation? yes; there is very little vegetation in the mining areas or near pads

What type of mining equipment is present? blade, dozers, crusher, various trucks, pipes + sprinklers on heaps

Are toxic or hazardous materials stored or used on site? Yes / No If yes, describe:

Probably stored cyanide on site, I didn't notice nor risk

Does operator/claimant have DOE permit for HAZMAT use? Yes / No / Are the materials being stored/used in accordance with conditions of DOE permit? Yes / No (if no, document on Attachment for immediate notification of DOE). Dept of Health issues permits for cyanide, (3-1)

Were weapons observed on site? Yes / No If yes, describe: permit status unknown.



RECLAMATION:

Has reclamation work reported by operator/claimant been completed: Yes / ☒ No

Tailings reshaped: Yes ☒ No  
Roads/Drill sites reshaped: Yes ☒ No  
Drill holes plugged: Yes ☒ No  
Has seeding been Successful Yes ☒ No

Streambeds reshaped: Yes ☒ No  
Topsoil respread: Yes ☒ No  
Area reseeded: Yes ☒ No

Describe Condition of Vegetation (e.g., % coverage of disturbed area): a few annuals on disturbed areas

Area any noxious weeds present on the project area? Yes ☒ No Describe weeds and any measures taken by operator/claimant for control: not applicable

Is reclamation adequate to allow release of acreage? Yes ☒ No

If not, what additional work is needed? -topsoil needed - seeding-

Total Cumulative Surface Disturbance from Past and Present Operations: 190 Acres

Total Acreage Reported as Reclaimed, but not Acceptable for Deletion : - Acres

Total Acreage Reported as Reclaimed, and Accepted by BLM (not active): - Acres

Total Acreage Reported as Reclaimed, and Accepted by BLM (not active): - Acres

Total Active Acreage of Disturbance Under this Notice or Plan : 190 Acres

Describe any Corrective Actions that must Take Place Immediately (including onsite instructions to operator): no immediate actions

Were any obvious violations of other agency permits identified? Yes / ☒ No If yes, describe permit and nature of violation: not on this inspection

GENERAL INSPECTION OBSERVATIONS AND COMMENTS:

see SICR



[illegible]

Are there any landfills or dumps for garbage, refuse, or other materials on site?  
Yes / No If yes, describe: none observed

\_\_\_\_\_ Livestock \_\_\_\_\_ Mineral Material Removal  
 \_\_\_\_\_ Type: \_\_\_\_\_ Number Present \_\_\_\_\_ Agriculture Developments  
 \_\_\_\_\_ ORV Use (Type: \_\_\_\_\_) \_\_\_\_\_ Timber Removal (Other than Mining U  
 \_\_\_\_\_ Recreation Use (Type: \_\_\_\_\_)  
 \_\_\_\_\_ Other Use: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

C. Reid  
Signature of Inspector



SURFACE INSPECTION  
COMPLIANCE REPORT

Date of Inspection: 6 Aug. 1991

Case Serial No.: UT-056-7P

Operator: Jumbo Mining

Project Description: heap leaching

Legal Description: T 14S, 15S ; R 10W, 11W Sec. 35, 36, 6, 7, 8, 1

District and Resource Area: Richfield District / House Range R.A.

Inspector: C. Reid - R. Cox

REPORT NARRATIVE (REFERENCE STIPULATIONS BY NUMBER OR TITLE)

The purpose of this inspection was to become familiar with the site and determine if Jumbo was operating their mine at all. They are in a shut down status until a court case with Western States is settled. Jumbo is not mining. There are three people staying on the site in camp trailers. The solution pond was suspiciously full of water. Mr. Hartshorn assured us this was from the recent rain in the area. This is may be the case.

Mr. Hartshorn showed us the different heaps. We were particularly interested in the high grade no. 7 heap as this is a major issue in court. Two new heaps have been submitted under a notice. A cultural survey was conducted July 24, 1991 for these areas and cleared July 30. While with Nancy, Christine found an unplugged drill hole just outside the main gate.

This file & operation is extremely complicated. Future, more detailed inspections will take place pending court actions.

Christina Reid

Signature of Inspector

Rex Lowley

Signature of Authorized Officer



**SURFACE INSPECTION  
COMPLIANCE REPORT**

Date of Inspection: 9 July 1992

Case Serial No.: UT-056-07P, UT-056-07-A, UT-056-07-B

Operator: Jumbo Mining

Project Description: Cyanide Heap Leach Mining

Legal Description: T. 14 and 15 S., R. 10 and 11 W., Sec. 35,  
36, 6, 7, 8, 1

District and Resource Area: Richfield/House Range

Inspector: Christina Reid, Rody Cox

REPORT NARRATIVE (REFERENCE STIPULATIONS BY NUMBER OR TITLE)

On July 9, 1992, Rody and I stopped at Jumbo Mining to perform a brief inspection. We first visited the site of the proposed Mizpah Pit. The drill roads we inspected seem to be re-vegetating themselves but they are not recontoured. Most of the older drill holes we found were plugged with cement. The cuttings are still piled on the surface. The two holes we found tags for are the JW 92-1 and MZ 81-23. The '92 hole was not plugged. Due to the lateness of the day, we decided that another inspection would need to be scheduled for another full day.

The gate to the main mine was locked. We continued to inspect the site on foot. The two most disturbing sites were the ponds and the area with sodium cyanide barrels and open lime bags. The ponds contained water and the exposed liners were torn in several places. The cyanide drums and open lime bags were north of the ponds approximately 100 feet.

We walked to the trailers and visited with Jim Bettridge. He told us that David Hartshorn was gone for the day. The operation is still in non-active status. Mr. Bettridge was concerned about upgrading a road to Jumbo's phone station/receiver. Rody told him that an amendment to Jumbo's Plan or Notice would need to be filed 15 days prior to their work on the road. There are no unforeseen problems with this proposed work.

Mr. Bettridge assured us that there was no cyanide in the ponds. They are not covered or fenced. Pictures were taken of the ponds and drums. A more detailed inspection will be scheduled with Mr. Hartshorn in the future.

Christina Reid  
Signature of Inspector

Lee L...  
Signature of Authorized Officer



## 3809 FIELD INSPECTION FORM

DATE OF INSPECTION 3/13/90 TIME 9:00-11:00 CASE SERIAL NO. UT-056-7PLOCATION: Township 15 S, Range 10 W, S.L.M.  
Section 7, Subdivision AA  
Section 6, Subdivision R1 S 1/2INSPECTOR Allard / Jackson DISTRICT & RESOURCE AREA RDO - House Range

Claimant Name \_\_\_\_\_ Present During Inspection: Yes / No

Operator Name Jumbo Mining Present During Inspection: Yes / NoOthers at Inspection: DAVID HARTSHORN - MINE MANAGER  
Michael Jackson RDO.Is the Operation Active? yesMSHA PERMIT NO. unknownIs Permit Current? unknownDOE PERMIT NO. unknownIs Permit Current? unknownDNR PERMIT NO. unknownIs Permit Current? yesCOUNTY SANITATION PERMIT NO. unknown Is Permit Current? unknownOTHER PERMITS: Department of Health, temporary will expire on 10/90

Indicate type of operations being conducted:

## EXPLORATION

- ☐ Claim staking  
☐ Clearing of timber or other vegetation  
☒ Drill pads  
☒ Drill holes (Plugged? yes / no)  
☐ Trenches  
☐ Test Pits  
☐ Bulk Sampling Sites  
☐ Reopened Old Adits/Shfts  
     (Gated? yes / No)  
☐ New Adits/Shfts (Gated? Yes / No)  
☐ Explosive Use or Storage  
☒ New Roads Constructed  
☐ Other (Describe on General Comments)

## MINING

- ☒ Underground Mine (Gated? Yes / No)  
☒ Mine Dumps  
☒ Surface Mine  
☐ Placer Mine  
☐ Tailings Pond  
☒ Ore Stockpile  
☒ Overburden Stockpiles  
☒ Waste Stockpiles  
☒ Vehicle Yarding Area  
☒ Adits/Shfts in operation abandoned  
☐ Explosives Use or Storage  
☐ New Roads Constructed  
☒ Hazardous Materials Stored or in Use.  
☐ Other (Describe on General Comments)

## MILLING

- ☒ Milling or Processing Facilities  
☒ Leaching Pad and/or Ponds  
☒ Powerlines  
☒ Hazardous Materials Present  
☒ Fuel Tanks (Above / Below Ground)  
     Amount Stored \_\_\_\_\_ gallons or cf  
     Is Site Lined? NO Bermed? yes  
☐ Additional Roads  
☐ Other (Describe on General Comments)

## STRUCTURES

- ☒ Temporary Camp Trailers  
☒ Buildings on Skids  
☒ Structures or Bldgs. Affixed to Land  
☐ Other Camp Facilities  
☐ Sanitary Facilities  
☒ Full Time Occupancy of Site  
☒ Seasonal or Temporary Occupancy  
☒ Occupancy Identified in Notice/Plan  
☐ Other (Describe on General Comments)



ACCESS:

Is public access allowed through site (e.g., no gates)? NO

Describe how access is blocked: gate and resident watchman

Describe the location of all new and existing access routes considered to be part of this project area and show their locations on the attached inspection map:

An extensive road net exists as required to mine several locations and haul ore to central processing facilities. Map is attached showing mine/hull area.

Describe the specifications of the roads (length, width of roadbed, total disturbed width from top of cuts to toe of sidecast, type of surfacing, presence and frequency of berms, ditches, culverts, water bars, etc.): Roads are gravel surfaced

and are built to the specifications required for use by large mine haul trucks.

Are any of the road cuts greater than 3 feet on the inside edge? Was this mentioned in the notice/plan? yes , yes

Was topsoil saved and stockpiled? Yes / NO / Not enough available - currently topsoil is point of contention between state and previous operator. loss of about 50,000 cubic yards has been identified.  
Describe all equipment found on site:

OPERATIONS:

Is the operation causing obvious erosion or other degradation? yes; surface mined areas and heaps are not supporting desirable vegetation

What type of mining equipment is present? grader, crusher, air line drill, Denver hammer drill, various loaders, various mine haul dump trucks

Are toxic or hazardous materials stored or used on site? Yes / No If yes, describe:

cyanide, lime, caustic soda, Neutron probe, various lab chemicals

Does operator/claimant have DOE permit for HAZMAT use? Yes / No / Are the materials being stored/used in accordance with conditions of DOE permit? Yes / No (if no, document on Attachment for immediate notification of DOE). DOE does not issue permits for the use of cyanide. Department of Health?

Were weapons observed on site? Yes / NO If yes, describe: mine has policy of no firearms on location except for resident watchman who is armed. A pile of spent 30-06 casings was noted adjacent to mine office



RECLAMATION:

Has reclamation work reported by operator/claimant been completed: Yes / No

Tailings reshaped: Yes No  
Roads/Drill sites reshaped: Yes No  
Drill holes plugged: Yes No  
Has seeding been Successful Yes No

Streambeds reshaped: Yes No  
Topsoil respread: Yes No  
Area reseeded: Yes No

Describe Condition of Vegetation (e.g., % coverage of disturbed area): no vegetation exists on disturbed areas

Area any noxious weeds present on the project area? Yes No Describe weeds and any measures taken by operator/claimant for control: Haloxylon. Operator at present is asserting this to be natural revegetation

Is reclamation adequate to allow release of acreage? Yes No

If not, what additional work is needed? research on vegetation establishment acquisition of topsoil.

Total Cumulative Surface Disturbance from Past and Present Operations: 190 Acres

Total Acreage Reported as Reclaimed, but not Acceptable for Deletion: 0 Acres

Total Acreage Reported as Reclaimed, and Accepted by BLM (not active): 0 Acres

Total Acreage Reported as Reclaimed, and Accepted by BLM (not active): 0 Acres

Total Active Acreage of Disturbance Under this Notice or Plan : 190 Acres

Describe any Corrective Actions that must Take Place Immediately (including onsite instructions to operator): CASE is extremely complex. Many different violations exist. the two operators are approaching litigation. No orders were issued pending coordination with state

Were any obvious violations of other agency permits identified? Yes No If yes, describe permit and nature of violation: heaps were constructed and leached without Department of health permits. Topsoil was not salvaged as per plan

GENERAL INSPECTION OBSERVATIONS AND COMMENTS:

— see narrative form —



## GENERAL INSPECTION OBSERVATIONS AND COMMENTS (cont'd):

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.

OTHER LAND USE OBSERVED:

Are there any landfills or dumps for garbage, refuse, or other materials on site?  
Yes / No If yes, describe: none observed

---

Is there any evidence of other public surface use or of potential trespass in the vicinity?: *none observed*

None observed

\_\_\_ Livestock  
     Type: \_\_\_\_\_ Number Present \_\_\_\_\_  
 \_\_\_ ORV Use (Type: \_\_\_\_\_)  
 \_\_\_ Recreation Use (Type: \_\_\_\_\_)  
 \_\_\_ Other Use: \_\_\_\_\_

\_\_\_ Mineral Material Removal  
 \_\_\_ Agriculture Developments  
 \_\_\_ Timber Removal (Other than Mining Use)

HOW MUCH TIME WAS SPENT ON SITE FOR THE INSPECTION? 2 hours on site.

2 additional days in investigating the file

Signature of Inspector 3/14/90



SURFACE INSPECTION  
COMPLIANCE REPORT

Date of Inspection: 03/13/90

Case Serial No.: VT-056-07P

Operator: Jumbo Mining Company

Project Description: underground mine, strip mine, cyanide heap leach, milling

Legal Description: T 15 S R 10 W sec 7

District and Resource Area: Richfield District; House Range Area

Inspector: Philip Allard accompanied by Michael Jackson

REPORT NARRATIVE (REFERENCE STIPULATIONS BY NUMBER OR TITLE)

A staff report was prepared on 3/15/90 by Philip Allard summarizing the file and permit history of this operation. The purpose of this inspection was two fold. The first was to get oriented to the mine. Neither Allard or Jackson had toured this facility. The second was to do an initial field review of the proposed Mizpah pit, currently under consideration as a significant amendment to the approved plan of operations. At the time of visit mining was shut down because of winter conditions. The water supply pipeline was frozen. Milling was being conducted by carbon stripping of pregnant liquor. Spraying of high grade number two was recently suspended and ice was in evidence. Principal safety procedure was the daily monitoring of pH of solutions. Mine's goal is to keep pH between 10.5 to 11. Hydrogen Cyanide gas begins to evolve from solution at a pH between 8.5 and 9.5. Aggressive action on this particular mine was not initiated because of the complex regulatory environment surrounding this project. These regulatory concerns are addressed in the staff report referenced above.

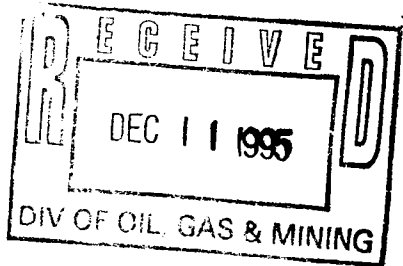
Philip A. Allard  
Signature of Inspector

Lee L. Lumber  
Signature of Authorized Officer



6305 Fern Spring Cove  
Austin, Texas 78730

Tel. (512) 346-4537  
Fax (512) 346-3188



Nov. 30, 1995  
File: DERR1195

Kent Gray, Executive Secretary (UST)  
Utah Solid and Hazardous Waste Control Board  
Division of Environmental Response and Remediation  
168 North 1950 West  
P.O. Box 144840  
Salt Lake City, Utah 84114-4840

RE: Closure notice for underground tanks at the Drum Mine  
Facility ID #2000244

Dear Mr. Gray:

Enclosed is our closure notice with accompanying soil analysis and chain of custody for our two underground tanks at the Drum Mine (facility ID #2000244). The tanks were closed on Oct 24, 1995 by Conrad Miller under the supervision of Gary Astin (DERR) and Bruce Hall (Central Utah Public Health Department).

Sincerely,

A handwritten signature in cursive script, appearing to read "David Hartshorn".

David Hartshorn  
Project Manager-Drum Mine

cc: Rody Cox, BLM  
Wayne Hedberg, DOGM



## 3809 FIELD INSPECTION FORM

DATE OF INSPECTION 11/16/90 TIME 10:30 am CASE SERIAL NO. VT-056-7PLOCATION: Township 15 S, Range 10 W, S.L.M.  
Section         , Subdivision           
Section         , Subdivision          6, 7, 8, 16 (parts of each)INSPECTOR P. Allard DISTRICT & RESOURCE AREA House Range / RichfieldClaimant Name Jumbo Mining Co. Present During Inspection: Yes / NoOperator Name Jumbo Mining Co. Present During Inspection: Yes / NoOthers at Inspection: Dave Hartshorn, Mine ManagerIs the Operation Active? yesMSHA PERMIT NO.          Is Permit Current? yesDOE PERMIT NO. NO Is Permit Current?         DNR PERMIT NO. Department of Health Is Permit Current? NOCOUNTY SANITATION PERMIT NO. NO Is Permit Current?         OTHER PERMITS: UDOGM, M/027/007 - current, under revision

Indicate type of operations being conducted:

## EXPLORATION

- ☒ Claim staking
- ☒ Clearing of timber or other vegetation
- ☒ Drill pads
- ☒ Drill holes (Plugged? yes / no)
- ☐ Trenches
- ☐ Test Pits
- ☐ Bulk Sampling Sites
- ☐ Reopened Old Adits/Shfts
- ☐ (Gated? yes / No)
- ☐ New Adits/Shfts (Gated? Yes / No)
- ☐ Explosive Use or Storage
- ☐ New Roads Constructed
- ☐ Other (Describe on General Comments)

## MILLING

- ☒ Milling or Processing Facilities
- ☒ Leaching Pad and/or Ponds
- ☐ Powerlines
- ☒ Hazardous Materials Present
- ☒ Fuel Tanks ( Above / Below Ground)
- ☐ Amount Stored          gallons or cf
- ☐ Is Site Lined? NO Bermed? NO
- ☐ Additional Roads
- ☐ Other (Describe on General Comments)

## MINING

- ☒ Underground Mine (Gated? Yes / NO)
- ☒ Mine Dumps
- ☒ Surface Mine
- ☐ Placer Mine
- ☐ Tailings Pond
- ☐ Ore Stockpile
- ☐ Overburden Stockpiles
- ☒ Waste Stockpiles
- ☒ Vehicle Yarding Area
- ☐ Adits/Shfts in Operation
- ☐ Explosives Use or Storage
- ☐ New Roads Constructed
- ☒ Hazardous Materials Stored or in Use.
- ☐ Other (Describe on General Comments)

## STRUCTURES

- ☒ Temporary Camp Trailers
- ☐ Buildings on Skids
- ☒ Structures or Bldgs. Affixed to Land
- ☐ Other Camp Facilities
- ☐ Sanitary Facilities
- ☒ Full Time Occupancy of Site
- ☐ Seasonal or Temporary Occupancy
- ☒ Occupancy Identified in Notice/Plan
- ☐ Other (Describe on General Comments)



ACCESS:

Is public access allowed through site (e.g., no gates)? NO.

Describe how access is blocked: gate area is also signed

Describe the location of all new and existing access routes considered to be part of this project area and show their locations on the attached inspection map:

NO NEW ROADS. see map in file from 3/13/90 inspection  
and Mizpah Pit plan amendment for location of  
disturbed areas

Describe the specifications of the roads (length, width of roadbed, total disturbed width from top of cuts to toe of sidecast, type of surfacing, presence and frequency of berms, ditches, culverts, water bars, etc.): Specifications of haul

roads vary. All are in good condition. There are  
numerous flat bladed drill roads at the site of the future Mizpah  
pit. About 2/3 of this area has been disturbed.

Are any of the road cuts greater than 3 feet on the inside edge? Was this mentioned in the notice/plan? Several haul roads have this. All was  
mentioned.

Was topsoil saved and stockpiled? ☒ Yes / No / Not enough available

Describe all equipment found on site: vehicles, trailers, scrap metal, crusher,  
air track, denver/gardner rotary rig / haul trucks / loaders / Backhoes

OPERATIONS:

Is the operation causing obvious erosion or other degradation? NO

What type of mining equipment is present? a wide variety of mining equipment  
commonly used for underground and surface operations.

Are toxic or hazardous materials stored or used on site? ☒ Yes / No If yes, describe:

Cyanide is used and stored. Barram pond is kept at 10 ppm free CN

Does operator/claimant have DOE permit for HAZMAT use? Yes / ☒ No / Are the materials being stored/used in accordance with conditions of DOE permit? Yes / ☒ No (if no, document on Attachment for immediate notification of DOE). This permit is being  
negotiated with Department of Health. Operator is in compliance with Department of  
Were weapons observed on site? Yes / ☒ No If yes, describe: Health conditions at this  
However 30.06 casing were noted. Watchman  
probably has weapon mine.



## RECLAMATION:

Has reclamation work reported by operator/claimant been completed: Yes / No

Tailings reshaped:	Yes	No	Streambeds reshaped:	Yes	No
Roads/Drill sites reshaped:	Yes	No	Topsoil respread:	Yes	No
Drill holes plugged:	Yes	No	Area reseeded:	Yes	No
Has seeding been Successful	Yes	<u>NO</u>			

Describe Condition of Vegetation (e.g., % coverage of disturbed area): only  
plant in evidence is Haloxylon

Area any noxious weeds present on the project area? Yes No Describe weeds and any measures taken by operator/claimant for control: Haloxylon. Fall  
seeding with scarification is planned on an experimental basis

Is reclamation adequate to allow release of acreage? Yes NO

If not, what additional work is needed? extensive reclamation work  
is still required

Total Cumulative Surface Disturbance from Past and Present Operations: 150\* Acres

Total Acreage Reported as Reclaimed, but not Acceptable for Deletion : 0 Acres

Total Acreage Reported as Reclaimed, and Accepted by BLM (not active): 0 Acres

Total Acreage Reported as Reclaimed, and Accepted by BLM (not active): 0 Acres

Total Active Acreage of Disturbance Under this Notice or Plan : 150\* Acres

Describe any Corrective Actions that must Take Place Immediately (including onsite instructions to operator): none

Were any obvious violations of other agency permits identified? Yes / NO If yes, describe permit and nature of violation:

## GENERAL INSPECTION OBSERVATIONS AND COMMENTS:

\* This is an approximate amount measured from maps. It includes the 1989 estimate by DORM for The mine/mill area, 21 acres for the Mizpah Pit (yet to be mined but significantly disturbed by exploration) and 4 acres estimated for various haul roads on BLM administered land. Some regrading has been completed but desirable perennial vegetation



GENERAL INSPECTION OBSERVATIONS AND COMMENTS (cont'd):

has not yet been established.

The mine is conducting a liner integrity test for the barren pond using a methodology designed by the Department of Health.

The mine is about to begin a seeding study on the ground using several different seed mixtures and seeding rates.

We visited the proposed site of a soil borrow area on unpatented mining claims. It appears that sufficient material  
(continued; Next page)

OTHER LAND USE OBSERVED:

Are there any landfills or dumps for garbage, refuse, or other materials on site?

Yes / No If yes, describe: House keeping is not a priority for this operator.

Material which may be junk but may also be used as a source of spare parts is stored at various locations around the mine.

Is there any evidence of other public surface use or of potential trespass in the vicinity?:

<input type="checkbox"/> Livestock	<input type="checkbox"/> Mineral Material Removal
<input type="checkbox"/> Type: _____ Number Present _____	<input type="checkbox"/> Agriculture Developments
<input type="checkbox"/> ORV Use (Type: _____)	<input type="checkbox"/> Timber Removal (Other than Mining Use)
<input type="checkbox"/> Recreation Use (Type: _____)	
<input type="checkbox"/> Other Use: _____	

a band of 7 antelope were outside the gate. A small herd (10 animals) of deer were also seen

HOW MUCH TIME WAS SPENT ON SITE FOR THE INSPECTION? 16 hours.

Philip Allard  
Signature of Inspector

Site is occupied 24 hours per day 7 days per week for security reasons.



SURFACE INSPECTION  
COMPLIANCE REPORT

Date of Inspection: 11/16/90

Case Serial No.: 44-56-78

Operator: Jumbo Mining Corporation

Project Description: Cyanide Heap Leach, Open Pit + Underground Mine

Legal Description: T15 S R 10 W

District and Resource Area: Richfield / House Range

Inspector: Phil Allard

REPORT NARRATIVE (REFERENCE STIPULATIONS BY NUMBER OR TITLE)

is available to obtain 50,000 cu yds in 2.5 to 5 acres.

We visited the site of the Mizpah pit and mapped the available soil material for salvages. Report of results filed separately. On some old drill roads it was noted that indian ricegrass and stipa comata were growing vigorously. I also noted a shrub that is probably Shadscale (but might be fourwing salt bush). The site also appears similar to conditions at Continental mine where blue bunch wheat grass (*agropyron spicatum*) has done well on disturbed areas.

Finally, we visited the site where the mine is considering building a new heap leach pad. An amendment to the mine plan will have to be submitted for this prior to construction.

The mine reported no wildlife mortalities due to cyanide. They said they had some use by birds, but the birds were not affected by the low level of cyanide which is maintained in the ponds.

Phil Allard  
Signature of Inspector

Rex Lowley  
Signature of Authorized Officer

Cyanide level = 10 ppm pH = 11.5. Heaps are gravity draining at the rate of 1 gallon per minute. Ponds have about 12 feet of freeboard, adequate for winter shut down.